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July 28, 2010

The Honorable Richard A. Meserve Co-Chairman Blue Ribbon Commission Transportation and Storage Subcommittee 1800 K Street, N.W., Suite 1014 Washington, D.C. 20006

Letter sent by facsimile

The Honorable Phil Sharp Co-Chairman Blue Ribbon Commission Transportation and Storage Subcommittee 1800 K Street, N.W., Suite 1014 Washington, D.C. 20006

Dear Commissioner Meserve and Representative Sharp:

The Nuclear Waste Strategy Coalition (NWSC) is an ad hoc group of state utility regulators, state attorneys general, electric utilities and associate members representing 49 organizations in 32 states. The NWSC was formed in 1993 out of frustration at the lack of progress the Department of Energy had made in developing a permanent repository for spent nuclear fuel (SNF) and high-level radioactive waste (HLRW), as well as Congress's failure to sufficiently fund the nuclear waste disposal program.

The NWSC believes that an effective disposal program should consist of a permanent repository; an integrated transportation plan; and centralized interim facilities that advance and complement the permanent repository while addressing near-term needs.

We are encouraged that the Blue Ribbon Commission Transportation and Storage Subcommittee, plans to tour and hold its first meeting at the Maine Yankee Atomic Power Independent Spent Fuel Storage Installation, Wiscasset, ME, on August 10, 2010. This is an opportunity for the Subcommittee to learn first-hand the issues decommissioned plants are faced with on a daily basis and the importance of removing SNF and HLRW currently stranded at decommissioned plant sites throughout this nation on an expedited basis.

The NWSC urges that the BRC recommend that federal government develop a plan to move and temporarily store SNF that is currently stranded at decommissioned reactor sites and operating reactor site(s) for consolidation at locations that volunteer to host SNF and HLRW storage facilities. In addition, we urge that the BRC recommend that the federal government also address the need for interim storage and disposal of greater-than-class-C waste.

Centralized interim storage facilities are a safe and cost-effective option for managing SNF and HLRW from decommissioned power plants and other facilities and should be authorized and funded for the near-term while a permanent facility is being licensed and constructed. However, centralized interim storage is not a substitute for a permanent repository and should be considered as a short-term solution only.

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In addition, operating nuclear power plants and decommissioned plants have already paid more than \$33 billion, including interest, into the Nuclear Waste Fund, for the removal of SNF and HLRW during this generation, and not to pass the problem on to future generations.

The members of the NWSC thank you for the opportunity to submit our input. We look forward to the opportunity to working with and providing further input to the Blue Ribbon Commission Transportation and Storage Subcommittee.

Respectfully yours,

David Wright

Commissioner, South Carolina Public Service Commission, and

Chairman, Nuclear Waste Strategy Coalition

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C: Mr. Timothy A. Frazier, Blue Ribbon Commission, Department of Energy, Nuclear Energy.